



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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April 24, 2003

Mr. Andrew T. Silfer  
Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Avenue  
Pittsfield, MA 01201

Via Electronic and U.S. Mail

RE: Comments on GE's April 16, 2003, response to EPA's April 9, 2003 Conditional Approval Letter for the Phase 2, Group 2 Floodplain Properties, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts

Dear Mr. Silfer:

On April 9, 2003, the U.S. Environmental Protection Agency (EPA) issued a conditional approval letter for pre-design investigation activities for the Phase 2, Group 2 Floodplain Properties (Phase 2) described in the General Electric Company's (GE) January 2002 "Pre-Design Investigation Work Plan for Floodplain Properties Adjacent to the 1 1/2- Mile Reach of the Housatonic River." In lieu of preparing an Addendum for the Phase 2 properties, EPA's April 9, 2003 letter required that GE submit a letter addressing the conditions contained the April 9, 2003 letter. GE submitted such a letter on April 16, 2003.

This letter contains EPA's conditional approval of GE's pre-design investigation and schedule for the Phase 2 properties that was transmitted to EPA on April 16, 2003. GE's activities for Phase 2 shall be in accordance with GE's January 2002 Pre-Design Work Plan and its April 16, 2002 letter, as conditionally approved by EPA's April 9, 2003 letter and by this letter. This approval for Phase 2 is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 2, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the above-referenced submittal subject to the following condition:

**Condition:**

1. On pages 2 and 3 of the April 16, 2003 letter, GE proposes to conduct a "screening-level" Appendix IX+3 sampling at Parcels I8-4-101 and Parcel I8-4-2,3,&4 in order to determine if any Appendix IX+3 compounds exceed applicable standards for these constituents in soil at residential properties. Following receipt of the initial Appendix

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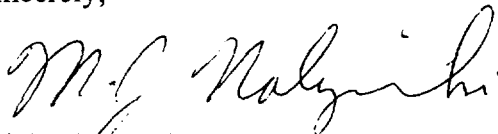
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IX+3 sampling results for these parcels, GE shall evaluate whether additional Appendix IX+3 sampling at these parcels is needed to assess achievement of the applicable Appendix IX+3 performance standards. GE shall submit the results of this evaluation and, if necessary, a proposal for additional sampling to EPA for review and approval as described in GE's April 16, 2003 letter. GE shall not consider this approval to use an Appendix IX+3 "screening-level" approach at these parcels as applicable for any other floodplain properties.

EPA reserves its right to perform additional sampling and/or Response Actions, if necessary, in the floodplain parcels located in the 1 ½ mile Reach of the Housatonic River to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918 - 1268.

Sincerely,



Michael J. Nalipinski  
GE Facility Project Manager

cc: Richard Gates, GE  
James Bieke, Shea & Gardner  
James Nuss, BBL  
Susan Steenstrup, MDEP  
Judy Morris, Weston  
K.C. Mitkevicius, ACOE  
Dean Tagliaferro, EPA  
Bryan Olson, EPA✓  
Rose Howell, EPA  
Holly Inglis, EPA  
Tim Conway, EPA  
John Kilborn, EPA  
Property Owner Parcel I8-4-1  
Property Owner Parcel I8-4-2,-3, and -4  
Property Owner Parcel I8-4-6  
Property Owner Parcel I8-4-7  
Property Owner Parcel I8-4-201  
Property Owner Parcel I8-4-202  
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